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to do justly, to love mercy, and to walk humbly with God Micah 6:8

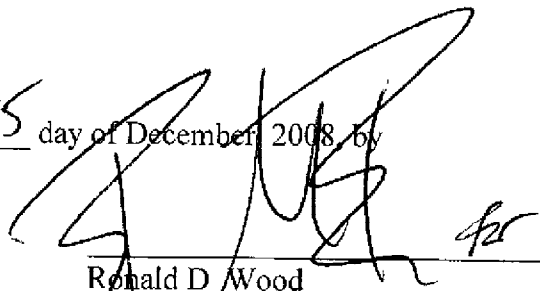
**IN THE SUPERIOR COURT, STATE OF ARIZONA
APACHE COUNTY**

In the Matter of:)
) **Case No. JV 2008- 065**
Christian Ryan Romero)
) **Motion for Initial Disclosure**
)
A person under 18 years)
)

The Juvenile, through counsel and pursuant to Rule 16 of the Rules of Procedure in Juvenile Court, moves for additional disclosure and an order from this court to provide reports from recently disclosed witnesses. The Rule, 16 (B)(1)(a) &(c) require not only the names and phone numbers of witnesses, but also their written reports and statements and the results of any testing. The government's latest disclosure provides none of the specific, important information necessary to schedule and complete interviews. Presumably, these reports would be provided at the interview, but such a scenario is not consistent with a properly conducted defense investigation or with the spirit of the Rules that require disclosure within 10 days of the initial appearance.

The Juvenile would therefore request an order compelling the required disclosure prior to the scheduling of any interviews with any officers or experts in this matter.

Respectfully submitted this 15 day of December, 2008, by



for

Ronald D. Wood
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Copies mailed this 15 day of
December, 2008, to
Judge Roca
Mr. Carlyon, Apache County Attorney
Client